Case 1:21-cv-00761-LGS-VF Document 470

Sandra D. Hauser

sandra.hauser@dentons.com D +1 212-768-6802 Filed 05/22/25 Page 1 of 1

Dentons US LLP 1221 Avenue of the Americas New York, NY 10020-1089 United States

May 21, 2025

dentons.com

## VIA ECF

The Honorable Lorna Schofield United States District Court, SDNY 500 Pearl Street, New York, NY 10007 Application **GRANTED**. The pre-motion conference is adjourned to July 15, 2025, at 3:30 pm. The parties are reminded of the need to file pre-motion letters at least two weeks prior. So Ordered.

Dated: May 22, 2025

New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: Harrington Global Opportunity Fund v. BofA Securities, et al., No. 1:21-cv-761

Dear Judge Schofield:

On behalf of Defendant CIBC World Markets, Inc. ("CIBC"), and pursuant to the Court's Order at ECF No. 467, we write to respectfully request that Your Honor reschedule the pre-motion conference currently scheduled for June 24, 2025 at 3:30 pm ET. Counsel for the other parties have been consulted and do not oppose this request.

Pursuant to the Sixth Amended Civil Case Management Plan (as amended by ECF No. 461), the parties are to appear in person for a pre-motion conference to address summary judgment or other dispositive motions that are raised in anticipated pre-motion letters, to be submitted at least two weeks before the scheduled conference.

Unfortunately, all counsel for CIBC have an unavoidable scheduling conflict with the current Pre-Motion Conference date of June 24, which requires their attendance in California that week, and thus respectfully ask that the Court reschedule the pre-conference hearing.

Additional scheduling issues affecting all parties warrant rescheduling as well. Specifically, the Court granted a short extension to complete expert discovery, which now will conclude on or by June 20, 2025 (ECF No. 467). The Sixth Amended Civil Case Management Plan provides that the pre-motion conference should occur approximately fourteen days after the close of all discovery. In order to allow the parties time to complete expert discovery and prepare and file any pre-motion letters at least two weeks before the pre-motion conference, we respectfully ask that the Court reschedule the pre-motion conference on a date convenient for the Court after July 11, 2025.

The accommodation is much appreciated.

Respectfully submitted,

/s/ Sandra D. Hauser Sandra D. Hauser

cc: All counsel of record via ECF